

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

**In re:**

**Juan Pablo Valdez**

**Debtor.**

**Case No. 24-12446-JDL  
Chapter 13**

**HUMBERTO TREJO'S AMENDED OBJECTION & APPLICATION FOR  
FINDINGS OF FACT AND CONCLUSIONS OF LAW**

Under Bankr. Rule 7052 & Fed. R. Civ. P. 52(b) Your Creditor Humberto Trejo Dominguez ("Trejo") requests this Court enter findings of fact and conclusions of law regarding any order on Trustee's Limited Motion to Stay Order Pending Determination of Appeal with Notice of Hearing [Doc 52]. Your Chapter 13 Trustee John T. Hardeman ("Trustee") filed the Limited Motion to Stay Order Pending Determination of Appeal with Notice of Hearing [Doc 52] contending that holding Your debtor Juan Pablo Valdez's ("Debtor") mortgage payments will not prejudice Debtor. Debtor filed an objection [Doc 62] and an amended objection [Doc 65] asserting it is fundamentally unfair for Trustee to hold Debtor's mortgage payments without using the payments to pay Debtor's mortgage because the mortgage company would foreclose on Debtor. [Doc 62], ¶4. Trejo concurs that withholding someone's mortgage payments without remittance is fundamentally unfair. That is exactly what Debtor did to Trejo when Debtor withheld Trejo's mortgage payments. To prevent Debtor from incurring analogous harm, Trejo amends his objection [Doc 53] to ask this Court to allow Trustee to disburse Debtor's mortgage payments to the applicable mortgagee. Notwithstanding this, Debtor asks this Court's order contain findings of fact and conclusions of law. Trejo asks this Court to find it is fundamentally unfair for Debtor to make mortgage payments to Trustee whilst Trustee holds the payments from Debtor's mortgagee.

**CONCLUSION**

Trejo requests this Court issue an order allowing the Trustee to disburse Debtor's mortgage payments to the relevant mortgagee. Trejo asks the order contain findings of fact and conclusions of law, including a finding that holding Debtor's mortgage payments in trust, whilst not paying the mortgagee is fundamentally unfair, consistent with Debtor's objections.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I certify that on March 07, 2025, I electronically transmitted this document to the Court Clerk using the ECF System for filing. Based on the records currently on file, the Court Clerk will transmit a Notice of Electronic Filing to the following ECF registrants, including:

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